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**UNITED STATES DISTRICT COURT**  
**DISTRICT OF OREGON**  
**PORTLAND DIVISION**

**HEATHER-LYNNE VAN WILDE**

**3:22-cv-01244-AR**

**PLAINTIFF,**

**v.**

**RULE 26 JOINT REPORT AND CASE  
MANAGEMENT SCHEDULE**

**CITY OF PORTLAND, et al.**

**DEFENDANT.**

Counsel for Defendant City of Portland and counsel for Plaintiff Heather-Lynne Van Wilde conducted an initial discovery conference pursuant to Fed. R. Civ. P. 26(f) and Local Rule 26-1 on November 28, 2022. After conferring, the parties have determined the best course of action for a proposed discovery plan and set forth the following proposed case management schedule following the Fed. R. Civ. P. 16 Conference held on November 29, 2022.  
(ECF 9):

1. In addition to the schedule set forth below, the parties will engage in early targeted discovery to identify and name as a party the John Doe officer defendant. Plaintiff will produce video of the incident by December 15, 2022. Plaintiff will serve targeted interrogatories and discovery requests by December 15, 2022.

2. Initial Disclosures, Discovery Schedule and Dispositive Motion Deadlines.

<u>EVENT</u>	<u>DATE</u>
Judicial Settlement Conference	<b>February 2023, to be scheduled with Judge Beckerman</b>
Initial Disclosures	<b>March 14, 2023</b> , 14 days from Judicial Settlement conference.
Amend Pleadings, Add Parties, and Join Claims	<b>September 14, 2023</b> , six months from Initial Disclosures
Complete All Fact Discovery	<b>January 15, 2024</b> , four months from Amend Pleadings
Dispositive Motions	<b>March 15, 2024</b> , two months following discovery and pretrial deadlines.
Expert Disclosures	<b>February 14, 2024</b> , 30 days after close of fact discovery.
Rebuttal Reports	<b>March 15, 2024</b> , 30 days after expert witness disclosure.
Expert Depositions	TBD
Deadline for ADR Report	To be set with the Court after the Court's ruling on dispositive motions, if any.

3. Treatment of Electronically Stored Information. The parties have discussed the existence of electronically stored information (ESI) in this matter. The parties will conduct electronic discovery according to the terms of the Federal Rules of Civil Procedure and the Local Rules. The parties have agreed to preserve ESI concerning the topics described in Paragraph 2 above located on any device in the possession, custody, or control of any party. The parties further agree to confer and agree on reasonable format for production of ESI.

4. Privilege Claims. As of the date of this report, the parties do not foresee any unusual issues of privilege or protection of trial preparation materials.

The parties do not anticipate the need for any special procedures regarding the clawing back of privileged material inadvertently produced in discovery. But Defendants will request a FRE 502(d) order.

5. Protective Order. The parties have discussed the potential need for a protective order. Both Plaintiff and Defendants do not anticipate the need for a protective order regarding certain information likely to be requested and produced in the litigation. If the need arises, the parties agree to confer and stipulate to a mutually agreed upon protective order.

6. Limitations on Discovery.

The parties do not foresee any other limitation on discovery not set forth in the applicable provisions of the Federal Rules of Civil Procedure and the Local Rules concerning discovery disputes.

Dated: December 6, 2022

Respectfully submitted,

PEOPLE'S LAW PROJECT

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